

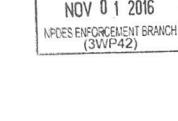
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October 28, 2016

Ms. Ingrid H. Hopkins
Water Protection Division (3WP42)
US EPA - Region III
1650 Arch Street
Philadelphia, PA 19103-3029
(215) 814-5437
hopkins.ingrid@epa.gov



RE: Benning Road Facility - NPDES Permit No. DC 0000094 Metal Excursions - Outfall 013Q

Dear Ms. Hopkins,

This letter is a follow-up to my October 24, 2016 telephone notification to report the daily maximum excursions of Copper, Iron and Zinc in a storm water grab sample collected on September 27, 2016 from Outfall 013. I made the required telephone notification in accordance with NPDES permit condition VI.6.

On October 24, 2016, Pepco received the laboratory analysis indicating that the daily maximum concentrations for the Copper, Iron, and Zinc were exceeded as shown in the following table:

Analyte Copper Iron Zinc	mg/l mg/l	Permit Limit Daily Max 0.0134 1 0.117	0.0222 2.2 0.175
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Pepco has not identified any specific cause of these excursions. Pepco continues to implement the corrective measures identified in the Phase 3 TMDL Implementation Plan to reduce the concentrations of metals in storm water discharges from the site.

As you are aware, Pepco is implementing additional corrective measures to ensure sustainable levels of compliance with the permit limits. Specifically, Pepco is in the process of obtaining a building permit for construction of a transformer storage shed to store offline or out-of-service transformers and other electric equipment prior to processing or disposal. This new covered structure will eliminate or minimize the exposure of staged or stored equipment that may be a source of metals in storm water that flows to the site's drainage system. In addition, Pepco is working with AECOM Engineering on the design and installation of a permanent storm water treatment system, which is scheduled to be in place and fully operational by December 31, 2017. Pepco will be submitting the revised conceptual design report for EPA's review by November 14, 2016.

Please contact me at (202) 331-6641 or by electronic mail at fmahvi@pepco.com if you have any questions or need additional information.

Sincerely,

Fariba Mahvi

Environmental Services

Pepco Holdings, Inc.

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